UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 16

UNITED PARCEL SERVICE, INC.)
Respondent)))
and) Cases 16-CA-028064) 16-CA-062316) 16-CA-070588) 16-CA-081494) 16-CA-085218
INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL UNION 373,)))
Charging Party.)

MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF OR RESPONSE TO EXCEPTIONS

Pursuant to Section 102.46 of the National Labor Relations Board Rules and Regulations, the Respondent, United Parcel Service, Inc. ("UPS") requests a 90-day extension of time to file either an answering brief or responses to Exceptions to the Decision of the Administrative Law Judge Keltner Locke dated August 15, 2013, for the following reasons:

- 1. UPS has been and is in the process of analyzing Exceptions filed by the Region on December 16, 2013. It will need this additional time to prepare a response to the Region's 71 Exceptions and 82 page Brief in Support of Exceptions.
 - 2. UPS's answering brief is currently due December 30, 2013.
- 3. UPS submits that the current request is for good cause and will not prejudice any party.

4. Counsel for UPS has conferred with Counsel for the General Counsel who has consented to the 90-day requested extension.

s/ Aron Z. Karabel

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Attorneys for United Parcel Service, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic and U.S. Mail upon:

Martha Kinard Regional Director National Labor Relations Board Region 16 Room 8A24, Federal Office Bldg. 819 Taylor Street Fort Worth, TX 76102

Reggie Thomas, Steward Teamsters Local 373 2305 Pecan Street Texarkana, AR 71854-3656

on December 23, 2013.

s/ Aron Z. Karabel	s/	Aron	\mathbf{Z}	Karabel	
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